

DETECTIVE JOSEPH MADER 1/10/2019

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1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MISSOURI
3 EASTERN DIVISION
4

5 SARAH MOLINA, et al
6 vs.
7 CITY OF ST. LOUIS, MISSOURI, et al
8 Cause No. 4:17-cv-2498 AGF
9

10 MALEEHA AHMAD, et al
11 vs.
12 CITY OF ST. LOUIS, MISSOURI
13 Cause No. 4:17-cv-2455-CDP
14

15
16 DEPOSITION OF DETECTIVE JOSEPH MADER
17 TAKEN ON BEHALF OF THE PLAINTIFFS
18 January 10, 2019
19

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21
22
23
24
25 (Starting time of deposition: 1:35 p.m.)

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23	and will be copied and attached to copies of the		
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1	UNITED STATES DISTRICT COURT	
2	EASTERN DISTRICT OF MISSOURI	
	EASTERN DIVISION	
3	SARAH MOLINA, et al,)
)
4	Plaintiffs,)
)
5	vs.) Cause No. 4:17-cv-2498
) AGF
6	CITY OF ST. LOUIS,)
	MISSOURI, et al,)
7)
	Defendants.)
8)
)
9	_____) _____
)
10	MALEEHA AHMAD, et al)
)
11	Plaintiffs,)
)
12	vs.) Cause No. 4:17-cv-2455
) CDP
13	CITY OF ST. LOUIS,)
	MISSOURI)
14)
	Defendant.)

17 DEPOSITION OF detective JOSEPH MADER,
 18 produced, sworn and examined on January 10, 2019,
 19 between the hours of eight o'clock in the forenoon and
 20 six o'clock in the afternoon of that day, at the
 21 offices of City Hall, 1200 Market Street, Room 314,
 22 St. Louis, Missouri, 63103, before Amy A. Victoria,
 23 Certified Court Reporter, in a certain cause now
 24 pending in the United States District Court, Eastern
 25 District of Missouri, Eastern Division, wherein SARAH

1 MOLINA, et al are the Plaintiffs and CITY OF
2 ST. LOUIS, MISSOURI, et al are the Defendants.

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1 A P P E A R A N C E S
2
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17 St. Louis, MO 63103
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21 Court Reporter:
22 Amy A. Victoria, CCR MO #556
23 Alaris Litigation Services
24 711 North Eleventh Street
25 St. Louis, MO 63101
(314) 644-2191
1-800-280-3376

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1 IT IS HEREBY STIPULATED AND AGREED, by and
2 between counsel for the Plaintiffs and counsel for the
3 Defendants that this deposition may be taken in
4 shorthand by Amy A. Victoria, Certified Court
5 Reporter, and afterwards transcribed into typewriting;
6 and the signature of the witness is expressly waived.

7 * * * * *

8 DETECTIVE JOSEPH MADER,
9 of lawful age, produced, sworn and examined on behalf
10 of the Plaintiffs, deposes and says:

11

12 DIRECT EXAMINATION

13 QUESTIONS BY MR. ROTHERT:

14 **Q. Good afternoon. Could you please state**
15 **your name and spell your name for the record.**

16 A. Joseph Mader, J-O-S-E-P-H, M-A-D-E-R.

17 **Q. Okay. And is your middle name Bryan --**

18 A. It is.

19 **Q. -- B-R-Y-A-N?**

20 A. Yes, sir.

21 **Q. My name is Tony Rothert. I am an attorney**
22 **representing plaintiffs in two cases, and we're doing**
23 **this deposition in two related lawsuits today. Molina**
24 **versus City of St. Louis, et al, in which you are a**
25 **defendant, and Ahmad versus City of St. Louis, in**

1 **officer during the Women's March in January of 2017?**

2 A. I would have been in the district by then.

3 I don't recall.

4 **Q. All right.**

5 A. It doesn't stand out in my head, no.

6 **Q. Do you tweet?**

7 A. Do I tweet?

8 **Q. Tweet.**

9 A. No.

10 **Q. Okay. Do you use Instagram?**

11 A. No.

12 **Q. Do you use Facebook?**

13 A. I have no social media.

14 **Q. Okay. Do you have My Space?**

15 A. I do not. Nor do I have Tinder.

16 MR. WHEATON: Does anybody?

17 MR. ROTHERT: Tom, Tom from My Space, I
18 think.

19 **Q. (Mr. Rothert) All right. Are you familiar**
20 **at all with the preliminary injunction that was**
21 **entered by a federal judge in the case Ahmad versus**
22 **City of St. Louis?**

23 A. I believe I've discussed that with my
24 lawyer.

25 **Q. Other than a conversation with your lawyer,**

1 **are you aware of it?**

2 A. I think that there was an e-mail sent out
3 at some point.

4 **Q. Do you know when that was?**

5 A. I don't.

6 **Q. What's your understanding of what it says?**

7 A. I'd have to read the e-mail again. I mean,
8 that was sometime ago, if I remember right.

9 **Q. And would you have done anything**
10 **differently on August 19, 2015 if that injunction had**
11 **been in place?**

12 A. Absolutely not.

13 **Q. How do you know that if you don't know what**
14 **it says?**

15 A. Well, again, it's not like, if what I
16 remember is right by it, it's not like they were
17 saying, hey, you know, we're going to allow people to
18 riot and assault the police. That's not the way that
19 I read it. I believe it was that they didn't want --
20 it was something to do with chemicals. Chemical
21 munitions. I'd have to read the e-mail again.

22 MR. ROTHERT: Okay. I appreciate your
23 patience today. You have -- I know you've been
24 deposed before so you probably know this. You have
25 the right to review the deposition and look it over,